

1290

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Mel Carnahan, Governor • David A. Shorr, Director

DIVISION OF ENVIRONMENTAL QUALITY  
P.O. Box 176 Jefferson City, MO 65102-0176

CERTIFIED MAIL - P179 978 687  
RETURN RECEIPT REQUESTED

November 17, 1993

Mr. Neil B. Schaffer  
Environmental Engineer  
Litton Advanced Circuitry  
4811 W. Kearney  
P.O. Box 2847  
Springfield, MO 65801-0847

  
R00337392  
RCRA RECORDS CENTER

Dear Mr. Schaffer:

Thank you for your letter of September 1, 1993, which contained additional information about the solid "resist" waste filtered from the stripper module at Litton Advanced Circuitry. Based on the information in your August 7, 1993, and September 1, 1993, letters, it appears that the "resist" waste is not hazardous waste. It appears from your description of the process that the "resist" stripper module is a process unit rather than a waste water treatment unit. Since the "resist" waste is filtered and removed from the stripper module separately from the wastewater treatment process, it does not appear to be a wastewater treatment sludge. On this basis, the Hazardous Waste Program would not consider the "resist" waste removed from the stripper module an F006 hazardous wastewater treatment sludge. Also, if the "resist" waste does not fail the analysis for any hazardous characteristic, then it would not be a characteristic hazardous waste.

Please note that the above discussion is guidance on characterization of the "resist" waste stream based solely on the information you have provided in your August 7, 1993, and September 1, 1993, letters to this office. 10 CSR 25-5.262(1) incorporating by reference 40 CFR 262.11 places the responsibility for determining whether solid wastes are hazardous wastes on the generator of the wastes. If information obtained in the future reveals that the "resist" waste is in fact hazardous waste, the guidance in this letter shall not preclude the department from initiating enforcement action for failure of Litton Advanced Circuitry to make a proper hazardous waste determination on the "resist" waste.

RCRA FILE COPY
ME 1007152903
DOCUMENT # 1290

Mr. Neil B. Schaffer  
November 17, 1993  
Page 2

Please feel free to contact me or my staff if you have any questions in the future.

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in cursive script, appearing to read "Ed Sadler".

Ed Sadler  
Director

ES:rh

c: Southwest Regional Office